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SOLID FINANCIAL TECHNOLOGIES, INC.

7 **UNITED STATES DISTRICT COURT**

8 **NORTHERN DISTRICT OF CALIFORNIA**

10 BYTECHIP, LLC d/b/a Qbit,

11 Plaintiff,

12 vs.

13 SOLID FINANCIAL TECHNOLOGIES,
14 INC.; EVOLVE BANK & TRUST

Defendants.

Case No. 3:24-cv-1226

**DECLARATION OF JAMES JUDAH IN
SUPPORT OF JOINT STIPULATION
FOR EXTENSION OF TIME FOR SOLID
AND EVOLVE TO ANSWER OR
OTHERWISE RESPOND TO
COMPLAINT PURSUANT TO CIVIL
LOCAL RULE 6-2**

1 I, James Judah, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Solid Financial Technologies, Inc. (“Solid”) in this matter. I have personal knowledge of the matters
5 set forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of the Joint Stipulation For Extension of Time for
7 Solid and Evolve Bank & Trust (“Evolve”) to Answer or Otherwise Respond to the Complaint.

8 3. Defendants believe that an extension of its time to answer the Complaint until June
9 5, 2024 is necessary and desirable based on the pending resolution of a federal forfeiture action in
10 the Western District of Tennessee (the “W.D. Tennessee Action”), which established a deadline for
11 any party to claim the account, around April 12, 2024.¹ As set forth in the Notice of Removal,
12 resolution of the W.D. Tennessee Action will resolve, or at least clarify, asserted claims in the
13 present action – and specifically may result in Bytechip LLC (“Bytechip”) voluntarily withdrawing
14 the Complaint in this action by that date. Plaintiff Bytechip and Co-Defendant Evolve have
15 consented to the desired extension.

16 4. The Parties agree that the proposed extension will not affect the Parties’ ability to
17 comply with other deadlines set forth in this case, except the Initial Case Management Conference
18 that the Parties respectfully request also be continued by 90 days.

19 5. With respect to Civil L.R. 6-2(a)(2), there are no previous time modifications in the
20 present case.

21 I declare under penalty of perjury under the laws of the United States of America that to the
22 best of my knowledge the foregoing is true and correct.

23 Executed on March 6, 2024 in Hillsborough, California.

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25
26 ¹ On February 12, 2024, the court ordered any party claiming an interest to file a claim within
27 sixty days of advertising the defendant virtual accounts on the internet at www.forfeiture.gov. *See*
28 *Dkt. 3-3* (Request for Judicial Notice in Support of Defendants’ Notice of Removal to Federal Court,
Exhibit 3) at 1.

1 DATED: March 6, 2024

2 By: /s/ James Judah

3 James Judah

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